

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re:	§	
	§	CASE NO. 17-64626-PMB
Sara Bertha Regalado	§	
aka Sara Bertha Stampe	§	CHAPTER 13
	§	
Debtor	§	
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Home Point Financial Corporation	§	
	§	
Movant	§	
v.	§	
	§	
Sara Bertha Regalado, Debtor	§	
aka Sara Bertha Stampe	§	
	§	
Melissa J. Davey, Trustee	§	
	§	
Respondents	§	

OBJECTION TO CONFIRMATION

COMES NOW, Home Point Financial Corporation (“Movant”), and makes and files its Objection to the Confirmation of the Debtor’s Chapter 13 plan for the reasons set forth below:

1.

Home Point Financial Corporation holds a first priority deed to secure debt on the Debtors’ real estate at 1540 Peachcrest Drive Lawrenceville, GA 30043.

2.

The Debtor’s Amended Plan references no prepetition arrearage owed to Home Point Financial Corporation.

3.

Home Point Financial Corporation shows an approximate arrearage of \$23,118.47

4.

The Debtor's plan is not feasible and does not provide Home Point Financial Corporation with adequate protection.

THEREFORE, based upon the above and foregoing facts, Movant, objects to the Confirmation of the Debtor's Chapter 13 Plan.

This the 9th day of November 2017

Respectfully Submitted

/s/Richard B. Maner

Richard B. Maner, GA Bar No. 486588
Attorney for Respondent
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CERTIFICATE OF SERVICE

This is to certify that I have served a copy of the **OBJECTION TO CONFIRMATION** electronically. Those not served electronically have been served by depositing same in the United States Mail in a properly addressed envelope to each with adequate postage thereon as follows:

Sara Bertha Regalado
1540 Peachcrest Drive
Lawrenceville, GA 30043

Howard P. Slomka
Slipakoff & Slomka, PC
Overlook III - Suite 1700
2859 Paces Ferry Rd, SE
Atlanta, GA 30339

Melissa J. Davey
Melissa J. Davey, Standing Ch 13 Trustee
Suite 200
260 Peachtree Street, NW
Atlanta, GA 30303

This the 9th day of November 2017

Respectfully Submitted

/s/Richard B. Maner

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